

Title I-Part A (Basic Program), Improving the Academic Achievement of the Disadvantaged

USES OF FUNDS

All uses of funds must be in conformity with EDGAR (34 CFR Parts 74-86), and Requirements of NCLB Act of 2001, Sec 1120A: Maintenance of Effort, Comparability of Services, and Supplement-Not-Supplant

Allowable Schoolwide Uses of Funds

The law provides many flexibilities and opportunities for LEAs and schools to meet the purpose of Title I-Part A. In Schoolwide Program schools, Part A funds may be used for research based activities that are part of the building's Schoolwide Program plan. It is also recommended that funds be targeted to the Title I program goal that all students will be proficient in reading and mathematics by SY 2013-14.

The limits listed under Allowable Targeted Uses of Funds for administration, supplies and equipment also apply to the Schoolwide Budget.

Allowable Targeted Uses of Funds

In Targeted Assistance schools, Part A funds can be used to meet the needs of only Title I served children and must be listed in the LEA's Consolidated Application.

Some allowable targeted costs are included below. This is not an exhaustive list. See the Education Department General Administrative Regulations (EDGAR), 34 CFR Parts 74-86, for the complete list.

- Employee salaries and benefits — that are for time devoted to the performance of the Part A program, as described in the approved Consolidated Plan Application. LEAs must maintain appropriate time distribution records for any employee who works on Part A duties but also has other duties. The recommended limit for administrative salaries/benefits and other administrative expenses is what are reasonable and necessary for the proper and efficient performance and administration of the program. Idaho suggests that no more than 10% of the allocation be used for administrative purposes.
- Professional development — if specifically related to the Part A program, designed to meet the specific educational needs of Part A participants, and supplements rather than supplants, state and local training. Teachers whose professional development is paid by Title I, Targeted Assistance, must have Part A participants in their classroom.
- Supplies and educational materials — if reasonable and acquired/consumed specifically for the purpose of the Title I-Part A program. The LEA must document the details and location of the supplies and the reason for the purchases.
- Equipment — if 1) necessary to effectively operate Title I-Part A programs, 2) existing equipment will not be sufficient and 3) the costs are reasonable. The LEA must document the details and location of the equipment and the reason for the purchases.
- Travel and conference costs — if specifically related to the Title I-Part A program and not to the general needs of the LEA or school and are reasonable and necessary.
- Maintenance/operation costs — (such as janitorial and utility costs) to the extent that costs are not otherwise included in rent or other charges for space, are reasonable

and necessary for the success of the Title I-Part A program, and are distributed on an equitable basis.

- Rental/lease of buildings — if the space is necessary for the operation of the program and space in publicly owned buildings is not available.
- Interest on lease purchase agreements — if in accordance with cost principles of OMB Circular A-87.
- Refreshments for parent meetings/trainings — if reasonable, particularly when such sessions extend through mealtime.
- Indirect costs-- if approved and on file with the Idaho Department of Education and costs included are in compliance with EDGAR.
- Financial incentives and rewards to teachers who serve students in the Title I schools identified for improvement, corrective action and restructuring for the purpose of attracting and retaining qualified and effective teachers. In making this reservation, the LEA cannot reserve more than 5% of the Title I-A allocation. However, it may reserve “such funds as are necessary” from the Title II, Preparing, Training and Recruiting Highly Qualified Teachers and Principals program for this purpose.
- To support ongoing training and professional development, as defined in Title IX (ESEA General Provisions). Equitable amounts must also be provided for participating private school parents and teachers.

Allowable Use of Title I for School Improvement Choice-Related Transportation and Supplemental Educational Services (SES)

School Improvement (Sec. 1116) costs may be paid from the Schoolwide or Targeted Assistance budgets up to the levels indicated. If the district chooses to pay these costs out of local funds rather than Title I, it should document that.

- An amount equal to 5% of LEA Title I allocation for choice-related transportation.
- An amount equal to 5% of LEA Title I allocation for SES. The LEA per pupil allocation (PPA) for SES is not the same as the PPA used for Title I building allocations. The LEA PPA for SES is based on formula child counts, while the PPA for building allocations is based on free and reduced price meal applications. The LEA PPA expended for these services must be the lesser of the two: 1) amount calculated by the Idaho Department of Education or 2) actual costs of Supplemental Educational Services received by the student.
- An amount equal to the remaining 10 percent of the LEA Title I allocation for choice-related transportation, SES, or both
- Total amount LEA spends must be equal to 20 percent of LEA Title I allocation, unless a lesser amount is required. An LEA may count in this amount its costs for parent outreach and assistance up to 0.2% of the LEA's Title I-A allocation (1% of the 20% obligation).

Required Uses of Title I-A Funds:

Professional Development for Schools in School Improvement Status (NCLB Section 1116)

10% of the school in needs improvement Title I building allocation must be spent on professional development to address the academic achievement problems that caused the school to be identified for School Improvement.

Professional Development for Districts in Improvement Status (NCLB Section 1116(c)(7)(A)(iii))

10% of the LEA's Title I allocation must be spent on professional development for districts identified by the Idaho Department of Education as being in Improvement status. This may include funds already reserved for building-level professional development for schools in improvement status, but may not include funds reserved for professional development to achieve highly qualified teachers as defined in NCLB, Section 9109(23). Title I-A funds set-aside by an LEA that has been identified for improvement should be used for professional development that addresses the area(s) that caused the LEA to be identified. This professional development may include all staff in the LEA, not just those in Title I-A schools. If the LEA does not spend the full 10% in a given year, it must carry over the unspent funds and spend them for that specific purpose in the following year. If the LEA is again identified for improvement in the following year, the LEA must also reserve 10% from that year's allocation for professional development activities.

Parental Involvement (NCLB Section 1118)

1% of the LEA's Title I allocation (if the LEA allocation is over \$500,000) must be used for parental involvement. 95% of the 1% must be made available to the individual Title I buildings for their use.

Private School Services (NCLB Section 1120)

The minimum amount of Title I-A funds a building must use for private school services is the number of low-income nonpublic school students residing in the Title I-funded attendance area and in the grade levels of the Title I-funded school multiplied by the corresponding Title I-served building's PPA. If the LEA also does a set-aside for salary differential, professional development, or parental involvement, the LEA must calculate the corresponding PPA of that set aside that should be used for private school service. LEA-hired teachers who instruct private school students should be included in the LEA's Schoolwide programs, and Title I-funded professional development activities.

Building Allocations (NCLB Section 1113)

An LEA must use Title I-A funds only in eligible school/attendance areas and according to the ranking order required by law. The following points summarize the requirements of Section 1113 of the Title I statute and §§200.77 and 200.78 of the Title I regulations for identifying eligible school attendance areas and selecting those eligible areas that will participate in Title I, Part A, and allocating Part A funds to participating areas:

- An LEA must rank all of its school attendance areas (the geographic area from which a public school draws its children) according to their percentage (not the number) of low-income children counted. An LEA must use the same measure of poverty for:
 - o Identifying eligible school attendance areas.
 - o Determining the ranking of each area.
 - o Determining the allocation for each area.
- The LEA must select a poverty measure from the following options:
 - o Children ages 5-17 in poverty as counted in the most recent census data approved by the Secretary.
 - o Children eligible for free and reduced-priced lunches under the National School Lunch Program.
 - o Children in families receiving assistance under the State program funded under Title IV, Part A of the Social Security Act (Temporary Assistance for Needy Families).
 - o Children eligible to receive medical assistance under the Medicaid program.

- A composite of any of the above measures.
- LEAs must provide Title I-A services to all schools over 75% poverty before serving any school at or below 75% poverty. If funds remain, the LEA may continue to serve schools in descending rank order of poverty, or may serve eligible schools in descending order according to their grade span groupings.
- LEAs may skip an eligible school if it can be demonstrated that the school is receiving supplemental funds from other state or local sources that are also spent according to the requirements of Title I-A. In order to “skip” an otherwise eligible school attendance area, the LEA must meet the three fiscal requirements found in Section 1113 (b)(1)(D).
 1. The school meets comparability requirements under 1120A(c).
 2. Is receiving supplemental funds from other state or local sources that are also spent according to the requirements of section 1114 or 1115. What is meant by "according to the requirements of section 1114 or 1115?"
 - Under §200.79 of the Title I regulations, a supplemental State or local program meets the requirements of Section 1114 if the program—
 - Is implemented in a school that meets the minimum 40 percent poverty threshold required to operate a schoolwide program;
 - Is designed to promote schoolwide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the State's challenging academic achievement standards that all students are expected to meet;
 - Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards; and
 - Uses the State's assessment system described in §200.2 of the Title I regulations to review the effectiveness of the program.
 - A supplemental State or local program meets the requirements of Section 1115 if the program—
 - Serves only children who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards;
 - Provides supplementary services designed to meet the special educational needs of the children who are participating in the program to support their achievement toward meeting the State's student academic achievement standards; and
 3. Uses the State's assessment system described in §200.2 of the Title I regulations to review the effectiveness of the program.
- LEAs with fewer than 1,000 students or with only one school per grade span are exempt from ranking.
- If an LEA is serving any school with poverty under 35%, each served school's allocation must be at least 125% of the school's minimum allocation. (The minimum allocation is the total LEA Title I-A allocation divided by the number of low-income children as determined using the poverty measure selected, and multiplied by 125%.) If an LEA is serving only schools at or above 35%, bear in mind the purpose of the funding is to enable children who are most at risk of not meeting the State's academic achievement standards and the allocation must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality

to achieve that purpose. Idaho recommends that these schools be served at the minimum allocation.

- PPAs may vary by school, as long as higher PPAs are provided to schools with higher percentages of children in poverty (either across the LEA or by grade span groupings), and do not exceed the amount allocated to any area or school above 75% poverty.
- If remaining funds are not sufficient to fully fund the next lower ranked eligible school, the LEA may serve the school if it can be demonstrated that the amount allocated is sufficient to enable children to make adequate progress toward meeting the State's performance standards.
- For all schools identified for school improvement, 10% of the amount of the school's Title I-A allocation must be used for professional development.
- When allocating funds to individual schools, an LEA may not reduce allocations by more than 15% from the prior year allocation for schools in corrective action or restructuring.